Emission Source Category	REGULATORY REQUIREMENTS			
	NSPS OOOO/OOOOa (as proposed) for new or modified facilities	**Utah**	**BLM Venting and Flaring rule (as in OMB) DELIBERATIVE/CONFID**	**U&O FIP (as proposed)**
Storage Vessel/Tanks	Control device required when emissions >6tpy VOC per tank	Control device required when tank emissions >4tpy and facility >5tpy.	Controls required on existing storage tanks > 6 TPY VOC	Control device required when sum of tank, dehy, and pneumatic pump emissions >4tpy VOC.
Pneumatic Pumps	Route to control device if one is on site, zero emission pumps if at gas plant	Control device required when tank emissions >4tpy and facility >5tpy.	Replace existing chemical injection or diaphragm pumps w/ zero-emission or route to flare if on site	Control device required when sum of tank, dehy, and pneumatic pump emissions >4tpy VOC.
Pneumatic Controllers	Install low-bleed, or better, at well head and compressor stations, no-bleed at gas plants	Replace high-bleed with low- or no-bleed	Replace existing high-bleed with low- or no-bleed	Replace high-bleed with low- or no-bleed
Glycol Dehydrators	Controls required under NESHAP HH if at major facility or >1tpy of Benzene if within an Urban Area and > 3 MMscfd. Area sources must reduce BTEX	Control device required when tank emissions >4tpy and facility >5tpy.		Control device required when sum of tank, dehy, and pneumatic pump emissions >4tpy VOC.
Leak Detection and Repair/ Fugitive Emissions	Using OGI (e.g. IR Camera)/Method 21, perform leak detection within 30 days of completion/modification. Then semi-annually. Mechanism to decrease/increase frequency depending on % leaking components. Exempt facilities < 15 BOE/d	Annual inspection Using IR Camera/OGI/Method 21	Operators w/ ≥500 wells, OGI at existing facilities semi-annually. < 500 wells, use portable analyzer + OVA. Mechanism to decrease/increase frequency depending on # leaking components.	I thought we were going to use UDAQs same requirements?
Flare Technology	Performance tests on enclosed flares – by Operator or by Manufacturer	Auto-igniters required on all new and existing flares	Auto-igniter	Auto-igniters required on all new and existing flares
Centrifugal Compressors	Capture and control emissions from wet seal compressors			

Reciprocating Compressors	Replacement of rod-packing every 26,000 hours or 3 years.			
Well Completions	Reduced emission completions and flare or re-inject or ose for production pruposes on HF oil & gas wells.		Reduced emissions completions, or re-inject, or use for production purposes on HF oil & gas wells AND conventional wells. Includes well workovers.	
Production Tests				
Liquids Unloading			Prohibit "purging" (blowdown) on new wells. BMPs to minimize venting on new and exisiting.	
Casinghead/ Associated Gases			Phase out flaring from development wells by issue of "Capture Orders" by zone. Backstop of ≤ 60 MCFD flared per well.	
Gas Conservation Plan			See "Capture Orders" by zone above.	